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*Attorneys for Defendants*  
*Unforgettable Coatings, Inc.;*  
*Unforgettable Coatings of Idaho LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JOSE ISMAEL ZUNIGA, on behalf of himself  
and all others similarly situated,

Plaintiff,

vs.

UNFORGETTABLE COATINGS INC.;  
UNFORGETTABLE COATINGS OF IDAHO  
LLC; DOES 1 through 50; inclusive.

Defendants.

Case No.: 2:21-cv-01221-JCM-VCF

**STIPULATION TO EXTEND DEADLINE  
FOR DEFENDANTS TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(THIRD REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Jose Ismael Zuniga, ("Plaintiff"), through his counsel, Gabroy Law Offices, and Defendants, Unforgettable Coatings, Inc. and Unforgettable Coatings of Idaho, LLC, ("Defendants"), by and through their counsel, Jackson Lewis P.C., that Defendants shall have an extension up to and including September 6, 2021, in which to file their respective responses to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. Plaintiff filed his Complaint on May 25, 2021 in the Eighth Judicial District Court of Clark County, Nevada, Case No. A-21-835257-C. The Summons and Complaint were served on or about June 8, 2021.

2. Defendants' filed their Petition for Removal of Civil Action from State Court on June 29, 2021.

1           3.       Defendants' Answer is currently due August 6, 2021.

2           4.       This is the third request for an extension of time for Defendants to file a response  
3 to Plaintiff's Complaint.

4           5.       The parties are discussing a potential resolution of Plaintiff's claims, which would  
5 render any such response unnecessary.

6           6.       This request is made in good faith and not for the purpose of delay.

7           7.       Nothing in this Stipulation, nor the fact of entering to the same, shall be construed  
8 as waiving any claim and/or defense held by any party.

9           Dated this 5th day of August, 2021.

10       GABROY LAW OFFICES

JACKSON LEWIS P.C.

11       /s/ Christian Gabroy

/s/ Lynne K. McChrystal

12       Christian Gabroy, State Bar No. 8805  
13       Kaine Messer, State Bar No. 14240  
14       Dominique Bosa-Edwards, State Bar No. 15705  
15       170 S. Green Valley Pkwy., Suite 280  
16       Henderson, NV 89012

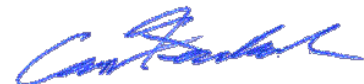
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Las Vegas, Nevada 89101

15       Attorneys for Plaintiff

Attorneys for Defendants

16                               **ORDER**

17                               IT IS SO ORDERED.

18                               

19                               \_\_\_\_\_  
20                               U.S. Magistrate Judge

8-5-2021

21                               Dated: \_\_\_\_\_  
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